



IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF MISSOURI
WESTERN DIVISION

GARY L. WALKER,

Plaintiff,

vs.

COUNTRY MUTUAL INSURANCE
COMPANY,

Defendant.

Case No: 06-00333-CV-REL

FIRST REQUEST FOR PRODUCTION OF DOCUMENTS TO DEFENDANT

COMES NOW the plaintiff, and requests defendant to produce for inspection and copying the following documents and things on the thirty-third (33rd) day after service of this Request at 9:00 a.m. at the offices of Barlow & Niffen, PC, 1125 Grand Boulevard, Suite 2020, Kansas City, Missouri, or by mailing copies of said documents and things to the above address:

1. All documents identified by you in your answers to this defendant's interrogatories.
2. All documents you are requested to identify in the interrogatories from this defendant to you.
3. All medical records, reports, statements, bills and receipts in any way relating to any injury claimed by plaintiff sustained in the occurrence described in the Petition.
4. All documents evidencing any communication between you and any other party to this litigation or the representative and/or insurance company of such party.
5. All documents evidencing any facts considered by you in evaluating and/or responding to plaintiff's underinsured motorist claim.

6. Copies of all factual information in your possession in regard to Plaintiff's claim under the insurance policy.

7. All documents evidencing any log and/or time sheets evidencing the date and the amount of time your employees and/or representatives have spent in investigating and/or evaluating plaintiff's underinsured motorist claim.

8. All documents evidencing any agreements between you and any other party to this litigation or the representative and/or insurance company of such party concerning plaintiff's underinsured motorist claim and/or other claims made in this litigation by plaintiff.

9. All documents which existed on the day of the accident evidencing the procedures and/or steps you expected and/or required your employees and/or representatives to follow in evaluating and/or responding to underinsured motorist claims made by your insureds.

10. All documents promulgated since the accident evidencing the procedures and/or steps you expect and/or require your employees and/or representatives to follow in evaluating and/or responding to underinsured motorist claims made by your insureds.

11. All documents which existed on the day of the accident evidencing all procedures and/or steps taken by you to ensure that your employees and/or representatives followed the recommended and prescribed procedures in evaluating and responding to underinsured motorist claims.

12. All documents promulgated since the accident evidencing all procedures and/or steps taken by you to ensure that your employees and/or representatives follow the recommended and prescribed procedures in evaluating and responding to underinsured motorist claims.

13. All documents evidencing all steps taken by you to ensure that your employees and/or representatives followed the recommended and prescribed procedures in evaluating and responding to plaintiff's underinsured motorist claim.

14. A certified copy of the insurance policy issued to Plaintiff, declaration page, and all applicable riders which were in effect on or about March 2, 2002.

15. All statements from the Plaintiff and any other person regarding the accident and/or subject matter of this accident and/or plaintiff's claimed injuries.

16. All correspondence, written memoranda, reports or other evidence in writing of any communication between Plaintiff and any representative of Defendant pertaining to the motor vehicle accident which occurred on March 2, 2002.

17. Copies of any and all video tapes and/or audio tapes and/or photographs obtained by any manner of surveillance of the Plaintiff.

BARLOW & NIFFEN, PC



WILLIAM E. NIFFEN II, MO #40524
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(816) 842-9009
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ATTORNEY FOR PLAINTIFF

Certificate of Service

I hereby certify that the original of the above and foregoing Request for Production of Documents to Plaintiff was hand-delivered by me, this 22nd day of August, 2006, to Wallace, Saunders, Austin, Brown & Enochs, Chartered, Attorneys for Defendant.

William E. Niffen II